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Philips Electronics North America Corporation*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

This Document Relates to:

*Dell Inc. and Dell Products L.P. v. Hitachi  
Ltd. et al.*, No. 13-cv-02171

Case No. 07-5944 SC

**DECLARATION OF TIFFANY B.  
GELOTT IN SUPPORT OF  
KONINKLIJKE PHILIPS N.V.'S AND  
PHILIPS ELECTRONICS NORTH  
AMERICA CORPORATION'S  
ADMINISTRATIVE MOTION TO SEAL  
DOCUMENTS PURSUANT TO CIVIL  
LOCAL RULES 7-11 AND 79-5(d)**

Date: February 6, 2015  
Time: 10:00 a.m.  
Place: Courtroom No. 1

Hon. Samuel Conti

1 I, Tiffany B. Gelott, hereby declare as follows:

2 1. I am an associate with the law firm of Baker Botts L.L.P., counsel for Defendants  
3 Koninklijke Philips N.V. and Philips Electronics North America Corporation (collectively, the  
4 “Philips Defendants”). I am a member of the bar of the District of Columbia and I am admitted to  
5 practice before this Court *pro hac vice*. I submit this declaration in support of the Philips  
6 Defendants Administrative Motion to File Documents under Seal Pursuant to the Civil Local  
7 Rules 7-11 and 79-5(d).

8 2. I have personal knowledge of the facts set forth herein and, if called upon, could  
9 and would competently testify thereto under oath.

10 3. On June 18, 2008, the Court issued a Stipulated Protective Order (Dkt. No. 306)  
11 (the “Stipulated Protective Order”).

12 4. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), the  
13 Philips Defendants seek to file the following documents or portions thereof under seal:

- 14 • Portions of Defendants’ Joint Notice of Motion and Motion for Summary Judgment  
15 Based Upon Plaintiffs’ Foreign Transactions Barred by the FTAIA (“Joint Motion”);
- 16 • Exhibit A to the Declaration of Tiffany B. Gelott in Support of the Joint Motion  
17 (“Gelott Declaration”) that contains interrogatory responses from Plaintiffs’  
18 Supplemental Responses to Defendants LG Electronics, Inc.’s and Samsung SDI Co.  
19 Ltd.’s First Set of Interrogatories, Nos. 8 and 9, dated June 16, 2014; and
- 20 • Exhibit B to Gelott Declaration contains excerpts from the Deposition of Julie French,  
21 dated June 2, 2014 that has been designated as “Highly Confidential” by the Plaintiffs.

22 5. The documents or portions of the documents submitted under seal contain either  
23 (a) material designated by other Defendants pursuant to the Stipulated Protective Order (Dkt. 306,  
24 June 18, 2008) as “Confidential” or “Highly Confidential” or (b) an analysis of, references to, or  
25 information taken directly from material designated by other Defendants pursuant to the  
26 Stipulated Protective Order as “Confidential” or “Highly Confidential.”

1           6.       I declare under penalty of perjury under the laws of the United States of America  
2 that the foregoing is true and correct to the best of my knowledge.

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5                               /s/ Tiffany B. Gelott  
6                               Tiffany B. Gelott  
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